



Nuclear Management Company, LLC  
Point Beach Nuclear Plant  
6610 Nuclear Road  
Two Rivers, WI 54241

NRC 2002-0093

10 CFR 50.90

October 17, 2002

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Dockets 50-266 and 50-301  
Point Beach Nuclear Plant, Units 1 and 2  
License Amendment Request 230, Control Room Emergency Filtration System (CREFS)  
Deletion of One-Time Allowed Outage Time Extension

In accordance with the provisions of 10 CFR 50.90, Nuclear Management Company, LLC (NMC) is submitting a request for an amendment to the Technical Specifications (TS) for Point Beach Nuclear Plant, Units 1 and 2.

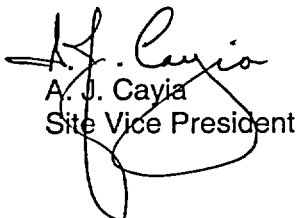
The proposed amendment would revise Technical Specifications (TS) 3.7.9, Control Room Emergency Filtration System (CREFS), by deleting the one-time extension to the allowed outage time (AOT) for CREFS and the exception to the requirements of LCO 3.0.4 and SR 3.0.4 that were allowed during the extended AOT. The one-time extension to the CREFS AOT was granted in License Amendments 203/208 on March 23, 2002 and its provision was recently expended to facilitate the online implementation of modifications/upgrades to CREFS.

Attachment I provides a description, justification and safety analysis, and No Significant Hazards Consideration for the proposed change. Attachment II provides the existing Technical Specification pages marked-up to show the proposed change. Attachment III provides the revised clean Technical Specification pages.

NMC requests approval of the proposed License Amendment by April 2003, with the amendment being implemented within 45 days. The approval date was administratively selected to allow for NRC review, but the plant does not require this amendment to allow continued safe full power operation.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Wisconsin Official.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on October 17, 2002.

  
A. J. Cayia  
Site Vice President

A001

NRC 2002-0093

Page 2

RDS/kmd

Attachments:    I   -   Description of Changes  
                  II   -   Proposed Technical Specification Changes  
                  III -   Revised Technical Specification Pages

cc:    NRC Regional Administrator        NRC Project Manager  
       NRC Resident Inspector            PSCW

**ATTACHMENT I**  
**TO NRC 2002-0093**

**DESCRIPTION OF CHANGES**  
**LICENSE AMENDMENT REQUEST 230**  
**TECHNICAL SPECIFICATION LCO 3.7.9, CREFS**  
**POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

## 1.0 INTRODUCTION

Nuclear Management Company, LLC (NMC) recently performed modifications/upgrades of the control room envelope to enhance control room habitability. In order to permit installation of certain portions of the upgraded design on the system, it was necessary that the Control Room Emergency Filtration System (CREFS) be declared inoperable. This required entry into the applicable action statement of Technical Specification (TS) 3.7.9, CREFS. However, installation of portions of the modifications/upgrades were expected to take longer than the 7 days normally allowed by the specification. To preclude an unnecessary dual unit shutdown during installation of the safety enhancing upgrades, a one-time extension of the 7-day allowed outage time (AOT) for CREFS to 30 days was required. Additionally, to facilitate restart of either unit during the CREFS outage, exceptions to the requirements of LCO 3.0.4 and SR 3.0.4 were also required.

The one-time extension of the CREFS AOT to 30 days was recently used during the performance of modifications/upgrades of the control room envelope. Therefore, deletion of the note that allowed the one-time extension of the CREFS AOT and exceptions to the requirements of LCO 3.0.4 and SR 3.0.4 is necessary to ensure the one-time extension of the CREFS AOT is not inadvertently used again.

This proposed License Amendment Request (LAR) is made pursuant to 10 CFR 50.90 to revise TS 3.7.9, CREFS, to delete the note that allowed a one-time extension to the AOT for CREFS to 30 days and allowed an exception to the requirements of LCO 3.0.4 and SR 3.0.4 during the extended AOT.

## 2.0 BACKGROUND

To enhance control room habitability, modifications/upgrades of the pressure boundary formed by the control room envelope were recently performed. These modifications/upgrades were designed to reduce the intrusion of unfiltered inleakage into the control room envelope by enhancing pressurization of the space and by the use of low leakage dampers with high grade industrial quality air distribution components. The parameter of unfiltered inleakage is a significant factor in the determination of control room total dose exposure. The modifications/upgrades included installation of bubble tight dampers for isolation of the control room and cable spreading room inlet ductwork; isolation of the computer room, control room, and cable spreading room smoke and heat ventilation ductwork; isolation of the control room toilet exhaust ductwork, and sealing of accessible ductwork that could contribute to unfiltered inleakage into the control room envelope.

However, to preclude an unnecessary dual unit shutdown during installation of these safety enhancing measures, a one-time extension of the 7-day allowed outage time for CREFS to 30 days was required. In a letter dated March 29, 2002, the NRC issued Amendments 203/208 to TS 3.7.9, approving a one-time extension to the CREFS AOT and an exception to the requirements of LCO 3.0.4 and SR 3.0.4 during the extended AOT for CREFS. PBNP expended this one-time extension of the CREFS AOT during July 2002 for installation of the control room envelope pressure boundary modifications/upgrades.

### 3.0 DESCRIPTION OF CHANGE

NMC has completed certain modifications/upgrades of the pressure boundary, formed by the control room envelope, to enhance control room habitability. These safety enhancing modifications/upgrades required use of a one-time extension of the 7-day allowed outage time for CREFS to 30 days.

TS 3.7.9 is proposed to be changed by the deletion of an asterisk to the 7-day Completion Time for Required Action A.1. The asterisk referred to a note that extended this Completion Time to 30 days, on a one-time basis for performance of CREFS modifications/upgrades.

The associated note will also be deleted:

\*The Completion Time of Required Action A.1 may be extended up to 30 days, on a one-time basis to implement modifications/upgrades to the CREFS. The provisions of LCO 3.0.4 and SR 3.0.4 are not applicable during the modifications/upgrades to the CREFS that require use of the extended Completion Time.

This one-time allowance in TS 3.7.9 existed only for the purpose of supporting the planned CREFS modifications/upgrades. This one time allowance did not affect the existing 7-day allowed outage time of TS 3.7.9 in the event that CREFS was determined to be inoperable for any other reason. Therefore, no changes to the TS Bases were necessary.

### 4.0 ANALYSIS

The CR-HVAC modifications/upgrades were part of a comprehensive effort to enhance the control room habitability envelope by providing the occupants with a greater margin of safety from exposure to the effects of airborne fission products. The modifications/upgrades were designed to enhance the capability of the system to minimize unfiltered inleakage into the control room envelope by replacing existing components with new higher grade components. The configuration, function, and control logic of this system were not changed during these modifications/upgrades.

The one-time allowance in TS 3.7.9, which extended the 7-day allowed outage time to 30 days, existed only for the purpose of supporting the planned CREFS modifications/upgrades. This one time allowance did not affect the existing 7-day allowed outage time of TS 3.7.9 in the event that CREFS was determined to be inoperable for any other reason.

Since this one-time allowance in TS 3.7.9 has been expended, the associated note may no longer be used and therefore no longer applies. As such, its removal has no affect on the Technical Specification or on allowed plant operation. This proposed amendment will return TS 3.7.9 to the condition in which it originally existed prior to the addition of the Note in Amendments 203/208.

## **5.0 NO SIGNIFICANT HAZARDS DETERMINATION**

In accordance with the requirements of 10 CFR 50.90, Nuclear Management Company (licensee) hereby requests amendments to facility operating licenses DPR-24 and DPR-27, for Point Beach Nuclear Plant, Units 1 and 2, respectively. The purpose of the proposed amendments is to revise Technical Specifications (TS) 3.7.9, "Control Room Emergency Filtration System (CREFS)", to delete a one-time extension to the allowed outage time (AOT) for CREFS.

Nuclear Management Company has evaluated the proposed amendments in accordance with 10 CFR 50.91 against the standards in 10 CFR 50.92 and has determined that the operation of the Point Beach Nuclear Plant in accordance with the proposed amendments presents no significant hazards. Our evaluation against each of the criteria in 10 CFR 50.92 follows.

**1. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments does not result in a significant increase in the probability or consequences of any accident previously evaluated.**

The operability of CREFS ensures that the control room will remain habitable for operators during and following all credible accident conditions. The inoperability or failure of CREFS is not an accident initiator or precursor. Therefore, the probability of an accident previously evaluated will not be significantly increased as a result of the proposed change. Because design limitations continue to be met and the integrity of the reactor coolant system pressure boundary is not challenged, the assumptions employed in the calculation of the offsite radiological doses remain valid. Therefore, the consequences of an accident previously evaluated will not be significantly increased as a result of the proposed change.

**2. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments does not result in a new or different kind of accident from any accident previously evaluated.**

The possibility for a new or different type of accident from any accident previously evaluated is not created as a result of this amendment. The evaluation of the effects of the proposed changes indicate that all design standards and applicable safety criteria limits are met. These changes therefore do not cause the initiation of any new or different accident nor create any new failure mechanisms.

Equipment important to safety will continue to operate as designed. Additionally, the changes do not result in any event previously deemed incredible being made credible. The changes also do not result in more adverse conditions or result in any increase in the challenges to safety systems. Therefore, operation of the Point Beach Nuclear Plant in accordance with the proposed amendments will not create the possibility of a new or different type of accident from any accident previously evaluated.

**3. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments does not result in a significant reduction in a margin of safety.**

There are no new or significant changes to the initial conditions contributing to accident severity or consequences. The proposed amendment will not otherwise affect the plant protective boundaries, will not cause a release of fission products to the public, nor will it degrade the performance of any other structures, systems or components (SSCs) important to safety. Therefore, deleting the one-time extension to the CREFS AOT will not result in a significant reduction in the margin of safety.

**Conclusion**

Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments will not result in a significant increase in the probability or consequences of any accident previously analyzed; will not result in a new or different kind of accident from any accident previously analyzed; and, does not result in a significant reduction in any margin of safety. Therefore, operation of PBNP in accordance with the proposed amendments does not result in a significant hazards determination.

**6.0 ENVIRONMENTAL EVALUATION**

NMC has determined that the information for the proposed amendments does not involve a significant hazards consideration, authorize a significant change in the types or total amounts of effluent release, or result in any significant increase in individual or cumulative occupational radiation exposure. Therefore, we conclude that the proposed amendments meet the categorical exclusion requirements of 10 CFR 51.22(c)(9) and that an environmental impact appraisal need not be prepared.

**7.0 REFERENCES**

1. FSAR 9.8
2. FSAR 14.3.5

**ATTACHMENT II**  
**TO NRC 2002-0093**

**PROPOSED TECHNICAL SPECIFICATION CHANGES**  
**LICENSE AMENDMENT REQUEST 230**  
**TECHNICAL SPECIFICATION LCO 3.7.9, CREFS**  
**POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**



### 3.7 PLANT SYSTEMS

#### 3.7.9 Control Room Emergency Filtration System (CREFS)

LCO 3.7.9 CREFS shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4,  
During movement of irradiated fuel assemblies,  
During CORE ALTERATIONS.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. CREFS inoperable.	A.1 Restore CREFS to OPERABLE status.	7 days*
B. Required Action and associated Completion Time not met.	B.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	B.2 Suspend movement of irradiated fuel assemblies.	Immediately
	<u>AND</u>	
	B.3 Be in MODE 3.	6 hours
	<u>AND</u>	
	B.4 Be in MODE 5.	36 hours

\* The Completion Time of Required Action A.1 may be extended up to 30 days, on a one-time basis to implement modifications/upgrades to the CREFS. The provisions of LCO 3.0.4 and SR 3.0.4 are not applicable during the modifications/upgrades to the CREFS that require use of the extended Completion Time.

**ATTACHMENT III**  
**TO NRC 2002-0093**

**REVISED TECHNICAL SPECIFICATION PAGES**  
**LICENSE AMENDMENT REQUEST 230**  
**TECHNICAL SPECIFICATION LCO 3.7.9, CREFS**  
**POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2**

### 3.7 PLANT SYSTEMS

#### 3.7.9 Control Room Emergency Filtration System (CREFS)

LCO 3.7.9 CREFS shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4,  
During movement of irradiated fuel assemblies,  
During CORE ALTERATIONS.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. CREFS inoperable.	A.1 Restore CREFS to OPERABLE status.	7 days
B. Required Action and associated Completion Time not met.	B.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	B.2 Suspend movement of irradiated fuel assemblies.	Immediately
	<u>AND</u>	
	B.3 Be in MODE 3.	6 hours
	<u>AND</u>	
	B.4 Be in MODE 5.	36 hours